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WASHINGTON, D.C. 20460

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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No. 2935-408. Diazinon® 14G Label Amendment dated 5/15/86 to add uses on Cranberries and Raspberries, and to change brand name. No Accession No. RCB#1469.

FROM: Kenneth w. Dockter, Chemist  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769) *Kenneth W. Dockter*

THRU: A.R. Rathman, Section Head  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769) *ARR*

TO: George T. LaRocca, PM#15  
Registration Division (TS-767)

Wilbur-Ellis Company, Fresno, California is submitting proposed labeling for WILBUR-ELLIS Diazinon 14G, EPA Reg. No. 2935-408 to add new uses on cranberries and on raspberries based on the cite-all method of data support. In the accompanying transmittal letter, Terry Miller (Regulatory Affairs/Registrations, Wilbur-Ellis Co.) states that they are also changing their brand name from Red-Top (on the Ciba-Geigy label) to Wilbur-Ellis; and that enclosures included, Formulator's Exemption form, Data Citation form, and (Confidential) Statement of Formula; only this last enclosure (i.e., the CSF) was included in the current package as received by RCB.

Our review also shall address the RD question of whether additional residue data are required. No previous diazinon 14G registrations carry uses for cranberries and/or raspberries. For reference, a label (FMC Corp. Diazinon 50 WP, which is registered for those racs) was included in this package as received by RCB. This non-reviewed 50-WP label, EPA Reg. No. 279-3037 AA; EPA Est. 279-CA-1, is based on Draft Labeling Dated 10/7/83. A copy of this draft label was not included in this package as received by RCB.

Wilbur-Ellis Diazinon 14G contains [redacted] [diazinon, (O,O-diethyl O-(2-isopropyl-6-methyl-4-pyrimidinyl) phosphorothioate)]. The components listed in the CSF are discussed in the Confidential Appendix to this memorandum.

MANUFACTURING PROCESS INFORMATION IS NOT INCLUDED

The Diazinon Registration Standard (updated Product and Residue Chemistry chapters, dated August 22, 1986) and Cover Memo of 10/20/86 include discussions of subject raw agricultural commodities.

Currently, the tolerances for residues of diazinon in or on cranberries and raspberries are established at 0.5 ppm (40 CFR 180.153).

Per the referenced (50 WP) label, the relevant (and maximum) registered uses on cranberries and raspberries are:

Cranberries: Apply 3 lbs. a.i. in 400 gals. of water per acre to control Cranberry fruitworm; 2 lbs. a.i. for Blackheaded fireworm. A 7-day PHI is in effect.

and

Raspberries: Mix 2 lbs. a.i. per 100-200 gals. of water and apply (either in spring before berries begin to form, or in fall after harvest) as a drench to the crown area and to the lower canes to control Raspberry crown (root) borer. A 7-day PHI exists.

The proposed uses to be added to the Wilbur-Ellis Diazinon 14G label are:

CRANBERRIES (Not for use in Calif.): Apply 3.1 lbs. a.i. per acre per year in a bog to control Cranberry Girdler. Water in with 1-2 inches of irrigation. Do not discharge water from bogs within 3 days of application. A PHI of 7 days is proposed.

and

RASPBERRIES (Not for use in Calif.): Apply 2.2 lbs. a.i. per acre to crown area (either in spring before berries begin to form, or in fall after harvest). A PHI of 7 days is proposed.

No analytical methodology was submitted with this petition. However, a sulfide method is available (Method II(c) in PAM, Vol. II) to enforce the established tolerances in or on cranberries and raspberries. The method was discussed in the Standard. The sulfide residue analysis method applied to cranberries (in PP#0198) and to raspberries (in PP#0362) is considered adequate only if whole samples were macerated prior to analysis.

No new metabolism data were submitted with this current petition. The available metabolism data are inadequate. Additional animal and plant data have been requested. The studies required were discussed in the Standard. Presently, diazinon per se is considered the residue of concern.

No new residue data were submitted with this current submission. The available residue data are inadequate to support the established tolerances because: (i) no tests reflect use of the 14% G formulation; (ii) the 50% WP formulation was not tested; (iii) no data reflect postharvest application; (iv) geographic representation was inadequate; and (v) it was not clearly indicated that whole sample macerates were used for extraction. Also, sample storage conditions; detection limit; and recovery data were not reported. Furthermore, data in RCB files show that residues exceeding the established tolerance have been found in cranberries.

No data are available depicting the nature and magnitude of residues of diazinon in natural waters and in fish, that may result from uses on the aquatic food crop cranberries. The required data and a proposed rule against direct application to bogs are discussed in the Standard.

Because the residue data required are dependent on metabolism data, HED has recommended that metabolism data be obtained and submitted before any of the required residue data.

Since cranberries and raspberries are not significant feed items, there will be no problem with secondary residues in meat, milk, poultry and eggs.

#### Conclusion and Recommendation

We conclude that the proposed diazinon 14G uses on cranberries and raspberries are essentially the same as the established, corresponding diazinon 50 WP uses.

However, the existing tolerances of 0.5 ppm diazinon in or on cranberries and raspberries are not supported by the available data. Additional metabolism and residue data are required.

Therefore, we recommend against accepting this label amendment.

Additionally, we do not have enough information on one inert to determine if it is cleared (See Confidential Appendix for details).

Attachment 1 (Confidential Appendix): copies to RD, TOX, RF, SF, Dockter, Amended Use file (diazinon), PMSD/ISB, Diazinon Reg. Std. file only

cc: Circu, RF, SF, Amended Use file (diazinon), PMSD/ISB, Diazinon Reg. Std. file

RDI: AARathman:12/18/86:RDSchmitt:12/18/86

TS-769:RCB:CM#2:RM 802:77886:K.W. Dockter:edited by Kd:12/19/86

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Diazinon residue chemistry review dated 12/19/86

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The material not included contains the following type of information:

- Identity of product inert ingredients
  - Identity of product impurities
  - Description of the product manufacturing process
  - Description of product quality control procedures
  - Identity of the source of product ingredients
  - Sales or other commercial/financial information
  - A draft product label
  - The product confidential statement of formula
  - Information about a pending registration action
  - FIFRA registration data
  - The document is a duplicate of page(s)
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The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.

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